

Denise Buckley

From: Denise Buckley
Sent: Friday, May 26, 2017 4:06 PM
To: 'Leo Glickman'
Subject: Burks v Stickney, 16-cv-759 - notices of deposition

Leo,

We have no objection to recording defendants' depositions by stenographic and video means. I have confirmed the availability of defendants Cross, Pepper, Stickney and Racette for the dates in your notices. Defendant Kirkpatrick is not available for deposition on June 29th, but is available between June 20th and June 27th. Defendant Smith is not available June 20th, but is available June 23rd, 27th or 28th. Defendant Nolan is retired and I have not been able to make contact with him yet. The defendants will appear at Clinton CF for their depositions, not in Albany. There is a facility for them to appear by video link up from Clinton. Please let me know if the court reporting company you have designated can arrange for video link up. Otherwise, you may attend at our office in Albany to conduct the depositions by video link-up. Alternatively, you may attend at Clinton for the depositions.

We need to agree the adjourned date for your client's deposition. Please let me know if you are available June 14th, 15th or 16th starting at 10 am. We can start a little later if that suits you better.

You will have to subpoena any non-party witnesses you wish to depose. Please note we will not accept service on behalf of any non-parties.

Best regards,

Denise Buckley | Assistant Attorney General
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From: Leo Glickman [mailto:lglickman@stollglickman.com]
Sent: Friday, May 19, 2017 5:08 PM
To: Denise Buckley <Denise.Buckley@ag.ny.gov>
Subject: notices of deposition

These are for the current parties. Once I determine who else at DOCCS I may want to depose, will you produce them or will I have to subpoena? Please advise.

Also, please note that I plan on recording these depositions by stenographic and video means. I am alerting you should you have any objection.

Finally, of course these dates are flexible according to your schedule and that of your clients. I have also dropped in the mail.

Leo Glickman
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